

Date: 4/12/2011

Federal Communications Commission
Public Safety and Homeland Security Bureau
1270 Fairfield Road
Gettysburg, PA 17325-7245

Subject: Construction/Coverage Deadline, Reference numbers 5104943 (WQLV702, WQLV701, and WQLV682).

Dear FCC:

In response to the reference number 5104943, the Commonwealth of Massachusetts, Department of State Police (MA SP) is requesting a waiver request of Rule 90.629 due to an extension of time required for construction. We have fully constructed all mobile units on both licenses but require additional time to construct the FB2 locations.

All radio system infrastructure equipment has been manufactured and shipped as of January 2011. The equipment is being installed and tested throughout this year.

We are requesting additional time to be fully constructed on the three call signs noted which are part of our Western Massachusetts "Troop B" P25 project.

MA SP is committed to construction of the radio system under these call signs; however there have been delays in the project. MA SP has a limited technical staff to manage this project, and additionally MA SP has needed to dedicate a large amount of time to the 800 MHz reconfiguration effort over the past few years, starting with the "1-120" phase in 2006. We are currently working on the NPSPAC and expansion band project that includes over 40 radio sites and 15,000 mobiles used by 100 user agencies. Delays in the rebanding project now put the completion date at approximately mid 2012 and it continues to strain the workload of the MA SP radio staff. The rebanding initiative has certainly impacted MA SP's ability to meet the 5 year construction deadline for the Troop B project, and has necessitated a waiver request of Rule 90.629.

The Massachusetts State Police was provided funding for construction of the mentioned call signs under a 30 million dollar bond (Senate Bill 2256, Chapter 142, 1790-2014. This was signed by the governor June 21, 2002. MA SP initially entered into a contract with Motorola in September of 2002 for work which included our Troop B project and the build out of call signs WQAC757, WQAX828, WQAF218 and WQAC656. Part of this project included improvements to our existing system and the majority was for the Troop B Project.

The Troop B area consists of very rural terrain in western Massachusetts, and only a few of the exiting radio sites are adequate for a project of this scope. As such, a large amount of site acquisition and civil work must precede any radio construction. The project requires use of some commercial tower sites which necessitated a lengthy state bid process in order to begin negotiations with tower owners. Also, in 2005 the Massachusetts State Information Technology Division (ITD) requested the baseline project technology platform be shifted from analog to

Project 25 technology requiring a complete re-design of the Troop B system. ITD manages the bond where the funding resides and funding was not released to the Department of State Police until the re-design was accepted. A large amount of engineering and site acquisition was needed to finalize the design. This included radio coverage predictions with Project 25 standards, microwave path studies, site assessments, drawings and site lease negotiations.

Once the rebanding project started, MA SP resources were strained to work on both the Troop B project and the rebanding initiative simultaneously. Subsequently, Motorola was engaged under a site acquisition contract in February 2006 to assist with the process. Many of the site acquisition tasks involve state permitting issues and require MA SP's staff to be closely involved, while simultaneously continuing the rebanding project.

The project is progressing but the large amount of civil work which must precede base station construction has a long time line. Accounting for all of these factors, MA SP has developed a more detailed time line that accurately plots the project tasks and their completion dates. When complete, this state wide trunked system will service not only MA SP but many of the 100 user agencies who currently use the 800 MHz network throughout the rest of Massachusetts.

The State Police continue to face challenges which mainly pertain to the acquisition and civil construction of the tower sites. Every effort was made to meet the time lines that were identified in the 2008 waiver but we need to request some additional time to be constructed. Although delayed, the Massachusetts State Police are committed to completion of our Troop B project under the noted call signs. Over 3 million dollars has been expended in site acquisition and civil costs. We have purchased approximately 940 Project 25 mobiles and portables at a total cost of 3.5 million dollars, and we purchased vehicle repeaters to be used in Troop B at a cost of 2.5 million dollars.

As noted earlier, some of the tower agreements had held up work at some of the sites. MA SP has now secured most of the tower agreements and has eliminated most of the delays that had held up civil work at sites. Construction is moving at a much quicker pace than before so we feel that the new requested construction dates will be met. The enclosed tables highlight what has been completed since the last waiver was granted.

Based on the information provided, we respectfully request that you approve our wavier request of Rule 90.629

Thank you for your consideration in this matter.

Respectfully,

C. Blair Sutherland
Director of Telecommunications

RADIO SERVICE	CALL SIGN	ULS LOC(L)# PATH(P)#	ANTENNA#	FREQUENCY ASSIGNED/LOWER	FREQUENCY UPPER
YE	WQLV702	1	1	851.17500000	
YE	WQLV702	1	1	851.22500000	
YE	WQLV702	1	1	851.42500000	
YE	WQLV702	1	1	852.47500000	
YE	WQLV702	1	1	852.66250000	
YE	WQLV702	1	1	852.97500000	
YE	WQLV702	1	1	853.90000000	
YE	WQLV702	2	1	851.17500000	
YE	WQLV702	2	1	851.22500000	
YE	WQLV702	2	1	851.42500000	
YE	WQLV702	2	1	852.47500000	
YE	WQLV702	2	1	852.66250000	
YE	WQLV702	2	1	852.97500000	
YE	WQLV702	2	1	853.90000000	
YE	WQLV702	3	1	851.17500000	Built out
YE	WQLV702	3	1	851.22500000	Built out
YE	WQLV702	3	1	851.42500000	Built out
YE	WQLV702	3	1	852.47500000	Built out
YE	WQLV702	3	1	852.66250000	Built out
YE	WQLV702	3	1	852.97500000	Built out
YE	WQLV702	3	1	853.90000000	Built out
YE	WQLV702	3	1	806.17500000	Built out
YE	WQLV702	3	1	806.22500000	Built out
YE	WQLV702	3	1	806.42500000	Built out
YE	WQLV702	3	1	807.47500000	Built out
YE	WQLV702	3	1	807.66250000	Built out
YE	WQLV702	3	1	807.97500000	Built out
YE	WQLV702	3	1	808.90000000	Built out
YE	WQLV702	4	1	851.17500000	Built out
YE	WQLV702	4	1	851.22500000	Built out
YE	WQLV702	4	1	851.42500000	Built out
YE	WQLV702	4	1	852.47500000	Built out
YE	WQLV702	4	1	852.66250000	Built out
YE	WQLV702	4	1	852.97500000	Built out
YE	WQLV702	4	1	853.90000000	Built out

RADIO SERVICE	CALL SIGN	ULS LOC(L)# PATH(P)#	ANTENNA#	FREQUENCY ASSIGNED/LOWER	FREQUENCY UPPER
YE	WQLV702	4	1	806.17500000	Built out
YE	WQLV702	4	1	806.22500000	Built out
YE	WQLV702	4	1	806.42500000	Built out
YE	WQLV702	4	1	807.47500000	Built out
YE	WQLV702	4	1	807.66250000	Built out
YE	WQLV702	4	1	807.97500000	Built out
YE	WQLV702	4	1	808.90000000	Built out

RADIO SERVICE	CALL SIGN	ULS LOC(L)# PATH(P)#	ANTENNA#	FREQUENCY ASSIGNED/LOWER	FREQUENCY UPPER
YE	WQLV701	1	1	851.87500000	
YE	WQLV701	1	1	852.21250000	
YE	WQLV701	1	1	852.43750000	
YE	WQLV701	1	1	852.53750000	
YE	WQLV701	1	1	853.10000000	
YE	WQLV701	1	1	853.12500000	
YE	WQLV701	1	1	853.33750000	
YE	WQLV701	2	1	851.87500000	
YE	WQLV701	2	1	852.21250000	
YE	WQLV701	2	1	852.43750000	
YE	WQLV701	2	1	852.53750000	
YE	WQLV701	2	1	853.10000000	
YE	WQLV701	2	1	853.12500000	
YE	WQLV701	2	1	853.33750000	
YE	WQLV701	4	1	851.87500000	
YE	WQLV701	4	1	852.21250000	
YE	WQLV701	4	1	852.43750000	
YE	WQLV701	4	1	852.53750000	
YE	WQLV701	4	1	853.10000000	
YE	WQLV701	4	1	853.12500000	
YE	WQLV701	4	1	853.33750000	
YE	WQLV701	5	1	851.87500000	
YE	WQLV701	5	1	852.21250000	
YE	WQLV701	5	1	852.43750000	
YE	WQLV701	5	1	852.53750000	
YE	WQLV701	5	1	853.10000000	
YE	WQLV701	5	1	853.12500000	
YE	WQLV701	5	1	853.33750000	
YE	WQLV701	6	1	851.87500000	
YE	WQLV701	6	1	852.21250000	
YE	WQLV701	6	1	852.43750000	
YE	WQLV701	6	1	852.53750000	
YE	WQLV701	6	1	853.10000000	
YE	WQLV701	6	1	853.12500000	
YE	WQLV701	6	1	853.33750000	
RADIO SERVICE	CALL SIGN	ULS LOC(L)# PATH(P)#	ANTENNA#	FREQUENCY ASSIGNED/LOWER	
YE	WQLV701	7	1	851.87500000	Built out

YE	WQLV701	7	1	852.21250000	Built out
YE	WQLV701	7	1	852.43750000	Built out
YE	WQLV701	7	1	852.53750000	Built out
YE	WQLV701	7	1	853.10000000	Built out
YE	WQLV701	7	1	853.12500000	Built out
YE	WQLV701	7	1	853.33750000	Built out
YE	WQLV701	7	1	806.87500000	Built out
YE	WQLV701	7	1	807.21250000	Built out
YE	WQLV701	7	1	807.43750000	Built out
YE	WQLV701	7	1	807.53750000	Built out
YE	WQLV701	7	1	808.10000000	Built out
YE	WQLV701	7	1	808.12500000	Built out
YE	WQLV701	7	1	808.33750000	Built out
YE	WQLV701	8	1	851.87500000	Built out
YE	WQLV701	8	1	852.21250000	Built out
YE	WQLV701	8	1	852.43750000	Built out
YE	WQLV701	8	1	852.53750000	Built out
YE	WQLV701	8	1	853.10000000	Built out
YE	WQLV701	8	1	853.12500000	Built out
YE	WQLV701	8	1	853.33750000	Built out
YE	WQLV701	8	1	806.87500000	Built out
YE	WQLV701	8	1	807.21250000	Built out
YE	WQLV701	8	1	807.43750000	Built out
YE	WQLV701	8	1	807.53750000	Built out
YE	WQLV701	8	1	808.10000000	Built out
YE	WQLV701	8	1	808.12500000	Built out
YE	WQLV701	8	1	808.33750000	Built out
YE	WQLV701	10	1	851.87500000	Built out
YE	WQLV701	10	1	852.21250000	Built out
YE	WQLV701	10	1	852.43750000	Built out
YE	WQLV701	10	1	852.53750000	Built out
YE	WQLV701	10	1	853.10000000	Built out
YE	WQLV701	10	1	853.12500000	Built out
YE	WQLV701	10	1	853.33750000	Built out

RADIO SERVICE	CALL SIGN	ULS LOC(L)# PATH(P)#	ANTENNA#	FREQUENCY ASSIGNED/LOWER	FREQUENCY UPPER
YE	WQLV701	10	1	806.87500000	Built out
YE	WQLV701	10	1	807.21250000	Built out
YE	WQLV701	10	1	807.43750000	Built out
YE	WQLV701	10	1	807.53750000	Built out
YE	WQLV701	10	1	808.10000000	Built out
YE	WQLV701	10	1	808.12500000	Built out
YE	WQLV701	10	1	808.33750000	Built out
YE	WQLV701	11	1	851.87500000	Built out
YE	WQLV701	11	1	852.21250000	Built out
YE	WQLV701	11	1	852.43750000	Built out

YE	WQLV701	11	1	852.53750000	Built out
YE	WQLV701	11	1	853.10000000	Built out
YE	WQLV701	11	1	853.12500000	Built out
YE	WQLV701	11	1	853.33750000	Built out
YE	WQLV701	11	1	806.87500000	Built out
YE	WQLV701	11	1	807.21250000	Built out
YE	WQLV701	11	1	807.43750000	Built out
YE	WQLV701	11	1	807.53750000	Built out
YE	WQLV701	11	1	808.10000000	Built out
YE	WQLV701	11	1	808.12500000	Built out
YE	WQLV701	11	1	808.33750000	Built out
YE	WQLV701	12	1	851.87500000	Built out
YE	WQLV701	12	1	852.21250000	Built out
YE	WQLV701	12	1	852.43750000	Built out
YE	WQLV701	12	1	852.53750000	Built out
YE	WQLV701	12	1	853.10000000	Built out
YE	WQLV701	12	1	853.12500000	Built out
YE	WQLV701	12	1	853.33750000	Built out
YE	WQLV701	12	1	806.87500000	Built out
YE	WQLV701	12	1	807.21250000	Built out
YE	WQLV701	12	1	807.43750000	Built out
YE	WQLV701	12	1	807.53750000	Built out
YE	WQLV701	12	1	808.10000000	Built out
YE	WQLV701	12	1	808.12500000	Built out
YE	WQLV701	12	1	808.33750000	Built out

RADIO SERVICE	CALL SIGN	ULS LOC(L)# PATH(P)#	ANTENNA#	FREQUENCY ASSIGNED/LOWER	FREQUENCY UPPER
YE	WQLV682	1	1	851.87500000	
YE	WQLV682	1	1	852.21250000	
YE	WQLV682	1	1	852.43750000	
YE	WQLV682	1	1	852.53750000	
YE	WQLV682	1	1	853.10000000	
YE	WQLV682	1	1	853.12500000	
YE	WQLV682	1	1	853.33750000	
YE	WQLV682	2	1	851.87500000	
YE	WQLV682	2	1	852.21250000	
YE	WQLV682	2	1	852.43750000	
YE	WQLV682	2	1	852.53750000	
YE	WQLV682	2	1	853.10000000	
YE	WQLV682	2	1	853.12500000	
YE	WQLV682	2	1	853.33750000	
YE	WQLV682	3	1	851.87500000	Built out
YE	WQLV682	3	1	852.21250000	Built out

YE	WQLV682	3	1	852.43750000	Built out
YE	WQLV682	3	1	852.53750000	Built out
YE	WQLV682	3	1	853.10000000	Built out
YE	WQLV682	3	1	853.12500000	Built out
YE	WQLV682	3	1	853.33750000	Built out
YE	WQLV682	3	1	806.87500000	Built out
YE	WQLV682	3	1	807.21250000	Built out
YE	WQLV682	3	1	807.43750000	Built out
YE	WQLV682	3	1	807.53750000	Built out
YE	WQLV682	3	1	808.10000000	Built out
YE	WQLV682	3	1	808.12500000	Built out
YE	WQLV682	3	1	808.33750000	Built out
YE	WQLV682	4	1	851.87500000	Built out
YE	WQLV682	4	1	852.21250000	Built out
YE	WQLV682	4	1	852.43750000	Built out
YE	WQLV682	4	1	852.53750000	Built out
YE	WQLV682	4	1	853.10000000	Built out
YE	WQLV682	4	1	853.12500000	Built out
YE	WQLV682	4	1	853.33750000	Built out

RADIO SERVICE	CALL SIGN	ULS LOC(L)# PATH(P)#	ANTENNA#	FREQUENCY ASSIGNED/LOWER	FREQUENCY UPPER
YE	WQLV682	4	1	806.87500000	Built out
YE	WQLV682	4	1	807.21250000	Built out
YE	WQLV682	4	1	807.43750000	Built out
YE	WQLV682	4	1	807.53750000	Built out
YE	WQLV682	4	1	808.10000000	Built out
YE	WQLV682	4	1	808.12500000	Built out
YE	WQLV682	4	1	808.33750000	Built out